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Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors
** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF AGENDA FOR
JANUARY 21, 2020, 10:00 A.M.
OMNIBUS HEARING**

Date: January 21, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

PROPOSED AGENDA FOR
JANUARY 21, 2020, 10:00 A.M. (PACIFIC TIME)
OMNIBUS HEARING

I: MATTERS SCHEDULED TO BE HEARD IN MAIN CASE: No. 19-30088 (DM)

UNCONTESTED MATTER GOING FORWARD

1. **Tubbs Settlement Motion:** *Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors to Settle the Claims of Tubbs Preference Claimants and (II) Granting Related Relief [Dkt. 5282].*

Response Deadline: January 17, 2020, at 12:00 p.m. (Pacific Time).

Responses Filed: No responses were filed.

Related Documents:

A. Declaration of Janet Loduca in Support of Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors to Settle the Claims of Tubbs Preference Claimants and (II) Granting Related Relief [**Dkt. 5283**].

B. Proposed Redacted Document [**Dkt. 5285**].

Related Orders:

C. Order Pursuant to 11 U.S.C. §§ 105(a) and 107(b) and Fed. R. Bankr. P. 9018 for Entry of an Order Authorizing Redaction and Sealing of Confidential Information from Tubbs Settlement Documents [**Dkt. 5301**].

D. Order Granting *Ex Parte* Motion of Debtors Pursuant to B.L.R. 9006-1 Requesting Order Shortening Time for Hearing on Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors to Settle the Claims of Tubbs Preference Claimants and (II) Granting Related Relief [**Dkt. 5292**].

Status: This matter is going forward on an uncontested basis.

CONTESTED MATTERS GOING FORWARD

2. **Make-Whole Premiums Brief:** *Debtors' Brief Regarding Utility Funded Debt Claims' Entitlement to Make-Whole Premiums and Joinder of PG&E Shareholders [Dkt. 4896].*

Response Deadline: January 14, 2020, at 4:00 p.m. (Pacific Time).

Responses Filed:

A. Consolidated Opening Brief of Certain Creditor Groups and Representatives Regarding the Entitlement of Holders of Utility Funded

Debt Claims to Optional Early Redemption, Make-Whole, or Similar Amounts in a Solvent Debtor Case [**Dkt. 4902**].

- B. Declaration of Andrew I. Silfen in Support of Consolidated Opening Brief of Certain Creditor Groups and Representatives Regarding the Entitlement of Holders of Utility Funded Debt Claims to Optional Early Redemption, Make-Whole, or Similar Amounts in a Solvent Debtor Case [**Dkt. 4903**].
- C. Consolidated Opposition Brief of Certain Creditor Groups and Representatives Regarding the Entitlement of Holders of Utility Funded Debt Claims to Optional Early Redemption, Make-Whole, or Similar Amounts in a Solvent Debtor Case [**Dkt. 5189**].

Related Documents:

- D. Declaration of Theodore E. Tsekerides, Esq. in Support of Debtors' Moving Brief Regarding Utility Funded Debt Claims' Entitlement to Make-Whole Premiums [**Dkt. 4898**].
- E. Debtors' Opposition to the Consolidated Opening Brief of Certain Creditor Groups and Representatives Regarding the Entitlement of Holders of Utility Funded Debt Claims to Optional Early Redemption, Make-Whole, or Similar Amounts in a Solvent Debtor Case; Joinder of PG&E Shareholders [**Dkt. 5190**].

Status: At this time, this matter is going forward on a contested basis.

3. **Ad Hoc Committee Motion for Reconsideration and Relief from TCC and Subrogation RSA Orders:** *Motion of the Ad Hoc Committee of Senior Unsecured Noteholders for Reconsideration and Relief from Orders Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b)* [**Dkt. 5241**].

Response Deadline: January 14, 2020, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Joinder of William B. Abrams to Motion of the Ad Hoc Committee of Senior Unsecured Noteholders for Reconsideration and Relief from Orders Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b) [**Dkt. 5353**].
- B. Debtors' Objection to Motion of the Ad Hoc Committee of Senior Unsecured Noteholders for Reconsideration and Relief from Orders Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b) [**Dkt. 5365**].
- C. Objection of the Ad Hoc Group of Subrogation Claim Holders to the Motion of the Ad Hoc Committee of Senior Unsecured Noteholders for Reconsideration and Relief from Orders Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b) [**Dkt. 5366**].
- D. Objection of Certain PG&E Shareholders to Motion of the Ad Hoc Committee of Unsecured Noteholders for Reconsideration of Orders Approving TCC and Subrogation Claimant RSAS; Joinder in Debtors' Objection [**Dkt. 5367**].

E. Joinder of the Baupost Group, L.L.C. in the Ad Hoc Group of Subrogation Claim Holders' Objection to the Motion of the Ad Hoc Committee of Senior Unsecured Noteholders for Reconsideration and Relief from Orders Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b) [**Dkt. 5376**].

Related Orders:

F. Order Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 (I) Authorizing the Debtors to Enter into Restructuring Support Agreement with the Consenting Subrogation Claimholders, (II) Approving the Terms of Settlement with Such Consenting Subrogation Claimholders, Including the Allowed Subrogation Claim Amount, and (III) Granting Related Relief [**Dkt. 5173**].

G. Order Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 (I) Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and Shareholder Proponents, and (II) Granting Related Relief [**Dkt. 5174**].

Status: This matter is going forward on a contested basis.

STATUS CONFERENCE

4. **Notice of Filing of Joint Chapter 11 Plan:** *Notice of Filing of Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated December 12, 2019* [**Dkt. 5102**].

A. Joint Chapter 11 Plan of Reorganization of Official Committee of Tort Claimants and Ad Hoc Committee of Senior Unsecured Noteholders [**Dkt. 4257**].

B. Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated December 12, 2019 [**Dkt. 5101**].

C. Statement of the United States of America in Response to the Court's Memorandum Regarding Confirmation Issues [**Dkt. 5087**].

D. Statement of the California State Agencies in Response to the Court's Memorandum Regarding Confirmation Issues [**Dkt. 5104**].

E. Stipulation Amending Order Establishing Preconfirmation Briefing and Hearing Schedule for Certain Legal Issues [**Dkt. 5254**].

Related Order:

F. Order Approving Stipulation Amending Order Establishing Preconfirmation Briefing and Hearing Schedule for Certain Legal Issues [**Dkt. 5312**].

G. Further Memorandum Regarding Confirmation Issues [**Dkt. 5389**].

Status: At this time, this matter is going forward.

CONTINUED MATTER

5. **Exit Financing Motion:** *Debtors' Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry Into and Performance Under, Exit Financing Commitment Letters and (II) Authorizing Incurrence, Payment and Allowance of Related Fees and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims [Dkt. 4446].*

Response Deadline: January 14, 2020, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Letter from the Official Committee of Unsecured Creditors to the Honorable Dennis Montali Regarding Exit Financing Discovery [Dkt. 4562].
- B. Letter from the Ad Hoc Committee of Senior Unsecured Noteholders to the Honorable Dennis Montali in Regards to November 4, 2019 Letter from Creditors' Committee [Dkt. 4566].
- C. Letter from the Official Committee of Tort Claimants to the Honorable Dennis Montali Regarding Exit Financing Discovery [Dkt. 4575].
- D. Letter from the Debtors to the Honorable Dennis Montali in Response to Letters Filed by Requesting Parties [Dkt. 4577].
- E. Letter Regarding Continuance of the December 17, 2019 Hearing on the Debtors' Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry Into and Performance Under, Exit Financing Commitment Letters and (II) Authorizing Incurrence, Payment, and Allowance of Related Fees and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims (the Motion) and Extension of Time to Respond to that Motion [Dkt. 4968].
- F. Letter Joining the Official Committee of Unsecured Creditors Request for a Continuance of the December 17, 2019 Hearing on the Debtors' Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry Into and Performance Under, Exit Financing Commitment Letters and (II) Authorizing Incurrence, Payment, and Allowance of Related Fees and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims (the Motion) and Extension of Time to Respond to that Motion [Dkt. 4970].
- G. Letter Brief of the TCC to the Honorable Dennis Montali [Dkt. 4971].

Related Documents:

- H. Declaration of Kenneth S. Ziman in Support of Debtors' Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Exit Financing Commitment Letters and (II) Authorizing Incurrence, Payment and Allowance of Related Fees and/or

Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims [**Dkt. 4447**].

- I. Debtors' Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry Into and Performance Under, Equity Backstop Commitment Letters, (II) Approving Terms of, and Debtors' Entry Into and Performance Under, Debt Financing Commitment Letters and (III) Authorizing Incurrence, Payment and Allowance of Related Fees and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims [**Dkt. 5267**].
- J. Declaration of Kenneth S. Ziman in Support of Debtors' Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry Into and Performance Under, Equity Backstop Commitment Letters, (II) Approving Terms of, and Debtors' Entry Into and Performance Under, Debt Financing Commitment Letters and (III) Authorizing Incurrence, Payment and Allowance of Related Fees and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims [**Dkt. 5268**].

Status: This matter has been continued to January 29, 2020 [**Dkt. 5346**].

PLEASE TAKE NOTICE that copies of any pleadings filed with the Court and referenced herein can be viewed and/or obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

Dated: January 17, 2020

**WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP**

By: /s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Debtors in Possession